October 10, 2022

Chair Tony Doan
Washington State Building Code Council
1500 Jefferson St SE
Olympia, WA 98501

Chair Doan and Members of the State Building Code Council:

The Lands Council, and our Climate Justice Program are writing today to strongly urge the State Building Code Council (SBCC) to **vote in support of the full package of residential energy code proposals that are out for public comment. In particular, we strongly support the requirements for heat pump systems in new homes and stricter ventilation for gas stoves to protect indoor air quality and health.**

Here are a few points for your consideration:

- Homes and buildings are the fastest growing source of carbon emissions in Washington State, with this increase largely attributable to the direct use of methane gas in appliances like hot water heaters and furnaces.
- Washington's 2021 State Energy Strategy found that electrifying homes and buildings will be the lowest-cost pathway to meeting the state's climate goals of reducing emissions 95% from 1990 levels by 2050.
- A new Stanford-led study reveals that methane leaking from gas-burning stoves installed in U.S. homes, even when they are turned off, has the same negative impact on the environment as the carbon dioxide emitted from around 500,000 gasoline-powered vehicles.
- Burning fossil fuels in the buildings sector in WA produced 18 million metric tons (MMT) of carbon dioxide equivalent (CO_2e) in 2018, the equivalent to the annual emissions from 3,957,182 cars or 5 coal plants.
- While Washington has a moratorium on fracked gas sites within our states, the majority of the gas piped into Washington is fracked gas from other states or Canada. Fracking and transporting fossil gas can lead to methane leaks, which may have even led to the recent spike on global methane emissions.
- These code proposals are also important for health reasons because they will play a key role in disincentivizing gas cooking - which many studies have documented is harmful for health - due to the economics of hooking up gas just for cooking. Gas stoves release unburned methane through leaks even when they are off; research shows that yearly leaks from all gas stoves in the U.S. could have as much of a climate impact as emissions from 500,000 passenger vehicles.

As the climate crisis progresses, its impacts are increasingly felt here in Washington. In the past year alone, we have seen the direct impacts of climate change in the shape of unprecedented wildfires, droughts, and heat waves which have cost hundreds of lives and have had untold economic impacts across the state. In the face of the climate emergency, it is critical that officials at all levels of government pass the policies

needed to reduce emissions, protect our communities from further harm, and foster resilience. **This package of proposals takes steps to address both the efficiency and the use of fossil fuels in our newest homes, which, once built, will be around for decades.**

Buildings are the fastest growing source of carbon emissions in Washington State, with this increase largely attributable to the use of fossil gas in homes and buildings. In 2018, burning fossil fuels in the buildings sector in Washington produced 18 million metric tons (MMT) of carbon dioxide equivalent (CO_2e), the equivalent to the annual emissions from 3,957,182 cars or 5 coal plants. As such, Washington's 2021 State Energy Strategy found that electrifying buildings will be the lowest-cost pathway to meeting the state's climate goals of reducing emissions 95% from 1990 levels by 2050. By statute, Washington's energy code is required to become increasingly more efficient every revision cycle so that new buildings in 2031 are 70% more efficient than those built in 2006. **Because there are only four code cycles between now and the 2031 code, it is essential that each revision maximizes what can be done to make buildings more efficient and transition away from fossil fuels.**

The heat pump proposals on the table help get us there; **most significantly, electric heat pumps systems are more efficient than fossil fuel options and eliminate on-site fossil fuel combustion.** Moving to highly-efficient heat pump technology can reduce energy use for heating and cooling homes, especially in comparison to outdated window air conditioning units. And as we continue to see peak temperatures rise in the northwest, more and more people will need air conditioning – which heat pumps provide alongside heating - to cope with heat-related health impacts, or to adequately cool their homes while they are shut inside due to wildfire smoke.

We urge the SBCC to vote in favor of the full package of proposed residential code amendments, including heat pump proposals.

Sincerely,

Naghmana Sherazi
Climate Justice Program Director
The Lands Council
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landscouncil.org